

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STEVE TEIXEIRA,

Plaintiff,

v.

MOZILLA CORPORATION a.k.a. M.F.
Technologies, a California corporation;
MOZILLA FOUNDATION, a California
public benefit corporation; LAURA
CHAMBERS and her marital community;
WINIFRED MITCHELL BAKER and her
marital community, and DANI CHEHAK and
her marital community,

Defendants.

Case No.: 2:24-CV-01032-RAJ

DECLARATION OF MARICARMEN
C. PEREZ-VARGAS IN SUPPORT OF
PLAINTIFF'S REPLY TO MOTION
TO COMPEL DISCOVERY
REQUESTS TO MOZILLA
CORPORATION AND INDIVIDUAL
DEFENDANTS

I, Maricarmen C. Perez-Vargas, am over the age of 18, have personal knowledge of all
the facts stated herein and declare as follows:

1. I am an attorney at Stokes Lawrence, P.S. and am counsel of record for Plaintiff
Steve Teixeira.

2. Attached as **Exhibit 1** is a true and correct copy of excerpts from the rough draft
deposition transcript of Dani Chehak taken on May 22, 2025.

DECLARATION OF MARICARMEN C. PEREZ-VARGAS IN
SUPPORT OF PLAINTIFF'S REPLY TO MOTION TO COMPEL
DISCOVERY REQUESTS TO MOZILLA CORPORATION AND
INDIVIDUAL DEFENDANTS - 1
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STOKES LAWRENCE, P.S.
1420 FIFTH AVENUE, SUITE 3000
SEATTLE, WASHINGTON 98101-2393
(206) 626-6000

